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**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND
THE COUNCIL**

on the application of Regulation (EU) 2019/788 on the European citizens' initiative

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1. INTRODUCTION

On 1 January 2020, [Regulation \(EU\) 2019/788](#) on the European citizens' initiative ⁽¹⁾ (the ECI Regulation) entered into application. This second ECI Regulation followed an extensive legislative reform that addressed the shortcomings in the application of the first ECI Regulation ([Regulation \(EU\) No 211/2011](#)⁽²⁾). The revised rules aim 'to make the European citizens' initiative more accessible, less burdensome and easier to use for organisers and supporters, and to strengthen its follow-up in order to achieve its full potential as a tool to foster debate' ⁽³⁾.

Article 25 of the ECI Regulation requires the Commission to periodically review the functioning of the European citizens' initiative (the ECI) and to report to the European Parliament and the Council on the application of the ECI Regulation no later than 1 January 2024 and every 4 years thereafter. This report assesses the application of the ECI Regulation and the functioning of the ECI instrument since 1 January 2020. It outlines the actions the Commission intends to take to further improve the implementation of the ECI Regulation and the functioning of the ECI, taking into account the review's findings and calls from stakeholders. This report also addresses various issues included in the European Parliament's [resolution](#) of 13 June 2023 on the implementation of the Regulations on the European citizens' initiative ⁽⁴⁾ and complements the Commission's reply to the European Parliament's resolution ⁽⁵⁾.

In order to assess the effectiveness of the revised rules, the Commission has carried out a number of consultations to serve as an evidence-base for this report ⁽⁶⁾: consultations with ECI organisers (an online survey and interviews) ⁽⁷⁾; an online survey of Member State authorities with responsibilities related to the implementation of the ECI Regulation ⁽⁸⁾; an online survey targeting citizens ⁽⁹⁾; and an exit survey targeting ECI signatories that have used the Commission's central online collection system ⁽¹⁰⁾. In the review process, the Commission has

(1) [Regulation \(EU\) 2019/788](#) of the European Parliament and of the Council of 17 April 2019 on the European citizens' initiative (OJ L 130, 17.5.2019, p. 55).

(2) [Regulation \(EU\) No 211/2011](#) of the European Parliament and of the Council of 16 February 2011 on the citizens' initiative (OJ L 65, 11.3.2011, p. 1).

(3) Recital 5, Regulation (EU) 2019/788.

(4) https://www.europarl.europa.eu/doceo/document/TA-9-2023-0230_EN.html

(5) <https://oeil.secure.europarl.europa.eu/oeil/spdoc.do?i=60031&j=0&l=en>

(6) The reports of the various consultation activities are published on the ECI review webpage: https://citizens-initiative.europa.eu/2023-eci-review_en.

(7) The online survey complemented with additional interviews resulted in 34 replies from representatives of ECIs.

(8) 25 Member States replied to the survey.

(9) Generating 7 271 replies.

(10) Generating 60 157 replies. An exit survey is a survey showed to visitors of a website when they are about to leave the website.

focused on ECIs registered since 1 January 2020 and on ECIs registered under the first ECI Regulation that were still ongoing on 1 January 2020 at various stages of the ECI procedure.

2. OVERVIEW OF THE REPORTING PERIOD

While the revised rules had just started to apply when it began, the COVID-19 pandemic significantly disrupted the ability of ECIs that were running at the time to carry out their campaigns across the EU. Table 1 shows the negative impact the COVID-19 pandemic had on the ECI. In 2020, when the revised rules started to apply, registration was requested for only five new ECIs. The temporary measures ⁽¹¹⁾ proposed by the Commission and adopted by the co-legislators on 15 July 2020 limited the impact of the pandemic on ECIs. Once the health situation improved, some positive developments could already be noted, with an increasing number of requests for registration and record numbers of ECIs collecting at least 1 million signatures and, correspondingly, a record number of Commission replies to ECIs.

Table 1: overview of ECIs in the reporting period

	2020	2021	2022	2023	TOTAL 2020-2023
Requests to register	5	11	11	13	40
Registered ECIs	5	11	10	11	37 ⁽¹²⁾
Refused ECIs ⁽¹³⁾		1			1
Withdrawn after Commission initial assessment				1	1
Valid and submitted	2		1	3	6
Verification completed successfully, not yet submitted to the Commission					2 ⁽¹⁴⁾
Answered		2		4	6 ⁽¹⁵⁾

In the reporting period, citizens and society could benefit from the positive impacts of previous successful ECIs. As a concrete follow-up to the first successful ECI ('Right2Water'), the

⁽¹¹⁾ [Regulation \(EU\) 2020/1042](#) of the European Parliament and of the Council of 15 July 2020 laying down temporary measures concerning the time limits for the collection, the verification and the examination stages provided for in Regulation (EU) 2019/788 on the European citizens' initiative in view of the COVID-19 outbreak (OJ L 231, 17.7.2020, p. 7–11).

⁽¹²⁾ Three requests are under legal assessment.

⁽¹³⁾ 'Eve Initiative for the Establishment of the Right to Decide'.

⁽¹⁴⁾ The ECIs 'Stop extremism' (verified before 2020) and 'Cohesion policy'.

⁽¹⁵⁾ The reply to the 'Fur Free Europe' ECI will be adopted by 14 December 2023.

revised Drinking Water Directive⁽¹⁶⁾, which had to be transposed by Member States into national law by 12 January 2023, is improving access to water including for vulnerable and marginalised groups. In response to the successful ‘Ban Glyphosate’ ECI, the Regulation on the transparency and sustainability of the EU risk assessment in the food chain⁽¹⁷⁾ entered into application on 27 March 2021 and gives citizens automatic access to all studies and information submitted by the industry in the risk assessment process.

The second ECI Regulation was accompanied by the introduction of a new generation of IT systems to support the functioning of the ECI: the central online collection system, the file exchange service⁽¹⁸⁾, the revamped ECI Forum and the new ECI register and public website⁽¹⁹⁾. Over the course of the reporting period, these systems were further improved in consultation with users and stakeholders. As decided by the co-legislators as part of the ECI reform, the individual online collection systems – which had been in use while a fully-fledged central system was not available – were gradually phased out⁽²⁰⁾.

3. ASSESSMENT OF THE APPLICATION OF THE ECI REGULATION

3.1. The ECI process in a nutshell

The ECI process involves several steps. In order to launch a citizens' initiative, a ‘group of organisers’ must be set up. Before organisers can start to collect statements of support from citizens, the proposed initiative must be submitted to the Commission to assess if the conditions for registration are fulfilled. Once registration is confirmed, organisers have 6 months to start the collection of signatures. They need to collect 1 million signatures within 12 months and to reach the required thresholds in at least 7 Member States. After having the collected signatures verified by national authorities and having received the confirmation that the thresholds were met, the ECI organisers can submit their initiative to the Commission for examination and official reply.

3.2. Right to support an ECI

Minimum age to support ECIs

Before 1 January 2020, the support age for ECIs was below 18 in three Member States in line with the voting age for European Parliament elections (16 in Austria and Malta, and 17 in Greece). In order to enhance the participation of young citizens in the democratic life of the European Union, the ECI Regulation allows Member States to lower the minimum age for supporting ECIs to 16 in accordance with national laws. Since the introduction of this provision,

⁽¹⁶⁾ [Directive \(EU\) 2020/2184](#) of the European Parliament and of the Council of 16 December 2020 on the quality of water intended for human consumption (recast) (OJ L 435, 23.12.2020, p. 1 - 62).

⁽¹⁷⁾ [Regulation \(EU\) 2019/1381](#) of the European Parliament and of the Council of 20 June 2019 on the transparency and sustainability of the EU risk assessment in the food chain (OJ L 231, 6.9.2019, p. 1–28).

⁽¹⁸⁾ The file exchange service facilitates the secure transfer of statements of support to national authorities.

⁽¹⁹⁾ <https://citizens-initiative.europa.eu/en>

⁽²⁰⁾ In practice one such system has been used by ECIs, the OpenECI software offered by civil society organisations. The last ECI using this system ended its collection period on 19 July 2023.

the minimum support age applicable to ECIs has been lowered to 16 in three Member States: Estonia (as of 1 January 2020), Germany (as of 1 January 2023) and Belgium (as of 1 May 2023), meaning that there are now six Member States where the minimum support age is lower than 18. In addition, Finland has indicated plans to lower the minimum support age to 16 and Ireland has announced plans to examine the lowering of the minimum voting age. Table 2 provides an overview of the minimum age for supporting ECIs in the 27 EU Member States.

Table 2: minimum age to support an ECI – state of play (June 2023)

18 years old	BG, CZ, DK, IE, ES, FR, HR, IT, CY, LV, LT, LU, HU, NL, PL, PT, RO, SI, SK, FI, SE
17 years old	EL
16 years old	BE, DE, EE, MT, AT

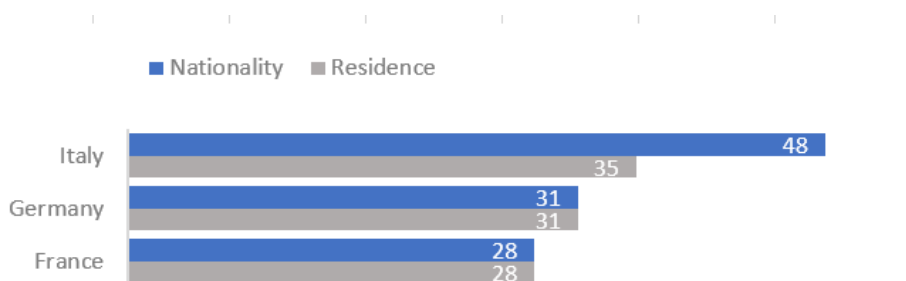
In their feedback, 15 Member States reported that they were not currently envisaging lowering the minimum support age to 16 and no decision had been taken in another three (Latvia, Slovenia and Slovakia).

75% of ECI organisers surveyed ⁽²¹⁾ considered that reducing the minimum support age to 16 in all Member States is important for the success of ECIs. However, citizens participating in the online survey had divided opinions on this point: 52% were in favour of lowering the minimum support age to 16 but 46% considered 18 to be the appropriate minimum support age.

Group of organisers

A condition for launching an ECI is to set up a **group of organisers** comprising at least seven EU citizens who must (i) be resident in seven different EU Member States and (ii) be of the age of voting in the elections for the European Parliament.

Chart 1: distribution of organisers by nationality and residence (top three Member States) ⁽²²⁾



⁽²¹⁾ 12 out of the 16 survey respondents.

⁽²²⁾ Full list in Chart 4 in the Annex.

The distribution by age groups (see Chart 5 in the Annex) shows a balanced representation across the different age categories, with a good representation of young people (21% under 30 years of age and 50% over 40 years of age).

The new ECI Regulation also allows the setting-up of a **legal entity** to manage an ECI; however only two organisers reported that they had done so and had found it overall useful. Those that had not used this possibility mentioned as reasons: the administrative burden, the associated costs and the procedural delays in setting up such legal entities.

3.3. Registration phase

The Commission has received **40** requests to register an ECI since the revised rules started to apply. During the reporting period, the Commission registered **37** ECIs in line with Article 6(3) of the ECI Regulation, also owing to the two-stage procedure ⁽²³⁾, which allows organisers to revise initiatives that otherwise cannot be registered as these (partially) fall outside the scope of Commission's powers. This procedure proved its usefulness by enabling 8 ECIs to be eventually fully registered. Only **1** request for registration was ultimately refused. Another request was withdrawn by its organisers after the initial Commission assessment.

In order for the registration process to run smoothly within the tight deadlines established in the ECI Regulation, the organisers need to submit comprehensive evidence of fulfilling the administrative requirements as part of their registration request.

83% of the surveyed organisers ⁽²⁴⁾ to whom the new rules for registration applied reported that the ECI procedure for registration was overall effective and straightforward. Only one respondent found the procedure very difficult to comply with. Most respondents ⁽²⁵⁾ considered that the requirements for registering an ECI are clear and that the technical process of submission through the organiser account is easy. Most of the respondents had found the conditions for registration quite easy to meet, but two of them (17%) considered the conditions relatively difficult to meet – due to the requirements for administrative checks related to residence and the need to ensure that no part of the ECI manifestly falls outside the Commission's competences. The greatest challenge reported by organisers during the registration phase is linked to resources – time and funding.

The surveyed organisers who had gone through the two-stage procedure for registration considered the information provided by the Commission in the initial assessment to be clear. They used the guidance offered by the ECI Forum, which most of them found essential for

⁽²³⁾ Article 6(4) of the ECI Regulation provides that where the conditions for registration of an ECI are met, with the exception of the requirement that 'none of the parts of the initiative manifestly falls outside the Commission's powers to submit a proposal for a legal act of the Union for the purpose of implementing the Treaties' (Article 6(3), first subparagraph, point (c)), the Commission must inform the organisers of this assessment. The organisers may either amend the initiative to take into account the Commission's assessment, maintain, or withdraw, the initiative. The organisers must inform the Commission of their choice and submit amendments, if any, to the initial initiative.

⁽²⁴⁾ 10 out of 12 replies representing initiatives registered after 1 January 2020.

⁽²⁵⁾ 10 out of 12 replies representing initiatives registered after 1 January 2020.

ensuring the registration of their ECI. Only in the case of the refused ECI registration did its representative report that the reasons for refusal were not fully clear ⁽²⁶⁾.

3.4. Collection phase

On 1 January 2020, 16 ECIs registered under the first ECI Regulation were still in the collection phase. Another 33 ECIs registered under the revised ECI Regulation started the collection phase during the reporting period. Table 3 provides an overview of ECIs at collection phase.

In the reporting period, a record number of **five ECIs** collected over 1 million statements of support, out of which three were registered under the second ECI Regulation. Three of the five successful initiatives benefited from the COVID-19 temporary measures. In addition, several ECIs that did not reach the threshold of 1 million statements of support collected a significant number of statements of support, thereby gaining visibility and generating debate across the EU or in certain Member States ⁽²⁷⁾. At the same time, 13 ECIs collected low numbers of signatures (below 10 000). This can be attributed to several causes that can reinforce one another, such as the public appeal and nature of the topic; the level of preparation and management of the collection campaign; and the perseverance and dedication that ECI organisers need to maintain over a longer period. Some organisers mentioned that ECIs that lack the support of entities such as NGOs or businesses find it difficult to collect significant numbers of signatures.

Table 3: overview of ECIs at collection phase ⁽²⁸⁾ (November 2023)

ECIs that collected over 1 million valid statements of support since 1 January 2020	5
ECIs withdrawn or closed with insufficient support, grouped by number of statements of support collected	29
- <i>At least 1 million signatures</i>	1 ⁽²⁹⁾
- <i>500 000 – 999 999 signatures</i>	1
- <i>250 000 – 499 999 signatures</i>	4
- <i>100 000 – 249 999 signatures</i>	1
- <i>50 000 – 99 999 signatures</i>	5

⁽²⁶⁾ The ECI Forum can support organisers during the registration phase with legal advice, particularly regarding the Commission competences to adopt legal acts. In the case of the only ECI that was refused, the organisers did not use the services of the ECI Forum despite being encouraged to do so.

⁽²⁷⁾ The ‘End the Slaughter Age’ ECI collected over 850 000 statements of support. Four other ECIs (‘Start Unconditional Basic Incomes (UBI) throughout the EU’, ‘Ban Fossil Fuel Advertising and Sponsorships’, ‘Ensuring Common Commercial Policy conformity with EU Treaties and compliance with international law’ and ‘Right to Cure’) collected between 250 000 and 300 000 statements of support.

⁽²⁸⁾ Based on information reported by ECI organisers or publicly available; not all ECIs registered under the first ECI Regulation reported the number of statements of support collected as this was not a legal requirement.

⁽²⁹⁾ For the ECI ‘Eat original’, thresholds were not met after Member State verification of the statements of support.

- 10 000 – 49 999 signatures	4
- 5 000 – 9 999 signatures	4
- Below 5 000 signatures	9
Collection ongoing	10
ECIs to start collection	4

Overall, since 2020, over 9 million statements of support have been collected. Over 90% of these signatures were collected online, and the rest were collected on paper.

The surveyed organisers reported that they were mostly satisfied with the effectiveness of the procedures and tools available for the signature-collection phase. Most respondents representing ECIs registered under the second ECI Regulation, considered useful the 6 months after registration ⁽³⁰⁾ for preparing the collection of signatures.

Respondents to the survey stated that the following enablers had helped them collect signatures: support from NGOs; the use of large signature-collection platforms (e.g. Avaaz, WeMove and Campact); the use of influencers; and gaining visibility in various national and EU media.

The surveyed organisers most often mentioned the following as challenges that they had faced during the collection phase: citizens' reluctance to provide the required personal data; citizens' lack of awareness about the ECI; finding the time to dedicate to the ECI; attracting media interest; and finding partners for promoting the ECI in at least seven Member States.

3.4.1. Online collection systems

The organisers of ECIs registered between 1 January 2020 and 31 December 2022 could opt to use either the central online collection system or another online collection system, in line with Article 11 of the second ECI Regulation. While a choice was still possible, **20 ECIs chose the central online collection system** and **6 chose the OpenECI software** offered by civil society organisations.

Of the 5 ECIs that collected over 1 million statements of support in this period, 3 used the central online collection system ⁽³¹⁾ and 2 used the OpenECI system ⁽³²⁾.

⁽³⁰⁾ Article 8(1) of the ECI Regulation allows the organisers to choose the start date of the collection period. The start date must be not later than 6 months from the date of registration of the ECI.

⁽³¹⁾ The 'Cohesion policy', 'Stop finning' and 'Save cruelty free cosmetics' ECIs.

⁽³²⁾ The 'Save bees and farmers!' and 'Fur Free Europe' ECIs.

Most organisers surveyed ⁽³³⁾ reported being satisfied overall with the system that they had chosen to use, although a few others ⁽³⁴⁾ reported lower satisfaction rates.

3.4.2. The central online collection system

In line with Article 10(1) of the second ECI Regulation, the Commission developed the central online collection system, which became operational on 1 January 2020. This new fully-fledged system replaced the solution provided by the Commission before 2020, which consisted of software coupled with a hosting agreement for the secure storage of the data on the Commission's servers. The new system, which is **available in all EU languages**, is used **free of charge** by ECI organisers. It is an easy-to-use, turnkey system in which the personal data are encrypted once collected and stored – ECI organisers only need to inform the Commission 10 working days before starting collection (Article 10(3)) and must sign an agreement with the Commission regarding the joint responsibility for data protection ⁽³⁵⁾. **No additional approvals** are necessary because the system already complies with all technical and security requirements. As provided for in Article 18(2), ECI organisers can also use the system to collect **supporters' email addresses** and are therefore able to keep their network informed about the progress of their ECI. The system is fully accessible to people with disabilities (in line with Articles 2(2) and 10(1)).

Under the first ECI Regulation, the ECI organisers were entirely responsible for the transfer of statements of support to the Member States for verification. Under the revised ECI Regulation, to ensure the security of citizens' personal data throughout the entire ECI cycle (from collection to the transfer to the Member States), the Commission has developed a **file exchange service** that facilitates via end-to-end encryption the safe transfer of statements of support collected online via the central online collection system to Member State authorities for verification. This application can also be used to transfer scanned paper statements. Although the revised rules do not require this, the Commission and Member States agreed that this tool could be used also by ECIs that were registered under the old rules or using individual systems ⁽³⁶⁾. The Commission prepared comprehensive guidance and organised extensive testing with the Member States on the use of the file exchange service and the associated management of the private and public keys. It also organised sessions with organisers to assist them with the process of encrypting and uploading statements of support that have not been collected via the central online collection system.

The **high level of security of the collection system** ensures that citizens' personal data are safely encrypted and processed from the moment they enter the collection system until the

⁽³³⁾ 4 of the 6 respondents that had used the central online collection system; and 4 of the 7 respondents that had used the individual online collection system.

⁽³⁴⁾ 2 of the 6 respondents that had used the central online collection system; and 3 of the 7 respondents that had used the individual online collection system.

⁽³⁵⁾ According to the Joint Controllership Agreement, the Commission is responsible for personal data collected online through the central online collection system, while ECI organisers are only responsible for the protection of personal data collected on paper.

⁽³⁶⁾ The tool was used for two ECIs registered under the first ECI Regulation: 'Save bees and farmers!' and 'End the Cage Age'.

moment they reach Member States' authorities for verification. The Commission provides information and training on the use of the central online collection system (webinars, online guides and videos). In addition, in line with Article 10(5) of the ECI Regulation, the Commission regularly consults users and stakeholders on further improvements of this system.

Some of the main improvements introduced to the central online collection system since 2020 are:

- **Security** – the system provides an end-to-end encryption of the personal data through all stages of processing; overall, the security features are regularly upgraded in line with the rules, standards and guidelines developed under [Commission Decision \(EU, Euratom\) 2017/46](#) on the security of communication and information systems in the European Commission ⁽³⁷⁾.
- The quality of the data collected from citizens has been improved, **following the implementation of formatting and 'checksum' rules** for ID documents for the 18 Member States that require an ID number in the support form, thus lowering the risk of rejection of statements of support and facilitating the verification process of Member States.
- **eID integrations** - since the launch of the revised rules, national eID schemes have been integrated into the central online collection system for 16 Member States, enabling citizens to sign without manually inputting their personal data. This option was not available in relation to the individual online collection systems.
- **Usability improvements** following a stakeholder consultation and a usability and accessibility study; in particular, the mobile version of the central online collection system has been further improved, making it easier for citizens to sign via their mobile devices.
- **Customisation of the signing page** - organisers can decide which information they want to be shown on the signing page (their own logo, progress bar with real-time information on the number of statements of support collected online, map indicating thresholds reached per Member State, progress per Member State, and recent supporters – Member State and date).
- **Data protection compliance** – a dedicated data controller module allows the Commission to comply with its duties as data controller under [Regulation \(EU\) 2018/1725](#) on the protection of personal data processed by the Union institutions ⁽³⁸⁾ and to swiftly respond to data subjects' requests.
- Provision of web analytics to organisers (data about traffic to their initiative page) and other relevant **statistics** per initiative, allowing them to assess the performance of their campaigns.

⁽³⁷⁾ OJ L 006 11.1.12017, p.40.

⁽³⁸⁾ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295, 21.11.2018, p. 39–98).

Citizens who have used the central online collection system have reported high levels of satisfaction with the system: over 93% of the respondents to the exit survey stated that it had been easy or very easy to support an ECI using it; a large majority of the respondents rated highly the clarity of the information explaining how to sign an ECI using the system; and a majority of respondents felt confident about the security of the personal data that they had provided through the system. Around 8% of users who participated in the exit survey reported a relevant disability and their overall satisfaction was also high (with an average score of 8 out of 10).

3.4.3. Use of eID (Article 10(4) of the ECI Regulation)

One of the key features of the central online collection system is the possibility of integrating within the system the national eID tools that citizens are familiar with at national level, thus reducing the risk of errors when they encode personal data. Member States have to ensure that their citizens can support ECIs online using notified electronic identification means or an electronic signature within the meaning of [Regulation \(EU\) No 910/2014](#) (eIDAS Regulation) ⁽³⁹⁾.

The integration of national eID schemes into the central online collection system has already been completed for 16 Member States. A further 5 Member States are in the process of making their national eID schemes available under the eIDAS Regulation (BG, DK, FR, PL and SI), the first step for integration with the Commission’s online collection system.

Table 4: state of play of eID integrations into the central online collection system (November 2023)

Enabling eID	BE, CZ, DE, EE, ES, HR, IT, LV, LT, LU, MT, NL, AT, PT, SK, SE
In progress	BG, DK, FR, PL, SI
Not enabling eID	IE, EL, CY, HU, RO, FI

Both ECI organisers and citizens reported in their respective surveys that they considered it important to allow the use of new solutions for electronic identification, such as eID and electronic signature for supporting ECIs.

While still marginal (2% of the total number of signatures collected via the central online collection system since 2020), the proportion of signatures collected via eID is increasing (5% in 2023) as more Member States have made these means available to their citizens. The

⁽³⁹⁾ [Regulation \(EU\) No 910/2014](#) of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (OJ L 257, 28.8.2014, p. 73–114).

proposed introduction of European Digital Identity Wallets ⁽⁴⁰⁾ is intended to speed up the adoption of such technologies in all Member States and to thus facilitate citizens' civic and community engagement. In the context of the ECI Expert Group, the Commission also invites Member States to report regularly on the progress they have made in implementing eID in their country.

3.4.4. Certification of individual online collection systems

The German authority ⁽⁴¹⁾ certified the individual online collection systems for the six ECIs that were registered after 1 January 2020 and used such systems. In its feedback, the German authority expressed the view that the one-month deadline for the certification of those systems is too short. It also underlined that, compared with the central online collection system, the certification of the individual collection systems required disproportionate effort from all Member States because they each have to conduct the procedures and invest the resources to carry out certifications within the deadline. In its feedback, Germany reiterated its support for the phasing-out of these systems by 31 December 2022 in accordance with Article 11(7) of the ECI Regulation.

ECI organisers taking part in the online survey considered that it was relatively difficult to comply with the technical specifications to obtain certification of their individual online collection system and to have the system certified by national authorities.

3.4.5. Assessment of the possibility of reintroducing the option for organisers to use individual online collection systems

In its resolution on the implementation of the ECI regulations ⁽⁴²⁾, the European Parliament called on the Commission to assess the possibility of reintroducing the option for organisers to use individual online collection systems. To assess this option, the Commission looked into three areas.

(i) The use of individual online collection systems

During the negotiations leading to the adoption of the second ECI Regulation, the co-legislators decided to phase out the use of individual online collection systems by the end of 2022. In the period between January 2020 and December 2022 (when a choice was still possible), 6 of the 26 registered ECIs (23%) chose to use the OpenECI system. In the last year when a choice was possible (2022), the organisers of only 2 of the 10 registered ECIs chose to use an individual online collection system. These figures provide a strong indication that **the demand for an alternative system to the central one is relatively limited**. The use of such systems also

⁽⁴⁰⁾ [Proposal for a Regulation of the European Parliament and of the Council amending Regulation \(EU\) No 910/2014 as regards establishing a framework for a European Digital Identity](#), COM (2021) 281 final.

⁽⁴¹⁾ [BSI - Erteilte Bescheinigungen über die Übereinstimmung individueller Online-Sammelsysteme mit der Verordnung \(EU\) 2019/788 \(bund.de\)](#)

⁽⁴²⁾ European Parliament resolution of 13 June 2023 on the implementation of the Regulations on the European citizens' initiative (2022/2206(INI)), https://www.europarl.europa.eu/doceo/document/TA-9-2023-0230_EN.html

creates a number of challenges and administrative burdens for both Member States ⁽⁴³⁾ and ECI organisers.

(ii) Burden on ECI organisers

Using an individual online collection system creates additional costs for ECI organisers as regards its development, management and certification ⁽⁴⁴⁾, when compared with the central online collection system, which is a free-of-charge turnkey solution. The ECI organisers are also the sole data controllers of personal data collected via individual online collection systems. In the case of the central online collection system, this responsibility is almost entirely with the Commission, which is entrusted with the management of the system.

Any reintroduction of individual online collection systems would entail **further burdens for ECI organisers to ensure compliance with the applicable technical specifications**, because these systems would have to be regularly audited to ensure continuing compliance throughout the collection period.

The Commission has looked into the specific needs that ECI organisers mention for choosing alternative systems. The most recurrent reason mentioned is the possibility of embedding that system in third-party websites, thus enabling the collection of signatures via a variety of entry points. The Commission therefore commissioned a study by an external IT research team ⁽⁴⁵⁾ to investigate whether there are embeddable solutions for the central online collection system that the Commission can offer to ECI organisers that ensure security and personal data protection in compliance with the ECI Regulation; and to estimate the operational and budgetary impacts of such solutions. The study showed that the decentralised collection of statements of support on multiple websites of unknown third parties entails significant security and data protection risks. In those cases where ECI organisers reported that they had embedded the individual online collection system on multiple websites, the certifying authorities indicated that they had not been notified of such essential changes to the certified system. This notification would allow them to assess whether those changes would (still) comply with the technical specifications set out in [Commission Implementing Regulation \(EU\) 2019/1799](#) ⁽⁴⁶⁾, including security and data protection requirements.

In view of the findings of the external experts, reintroducing the individual online collection systems would require any ‘embedded’ websites to be included in the certification, combined with a regular auditing mechanism to check that the respective campaigning websites remain

⁽⁴³⁾ See also section 3.4.4. above.

⁽⁴⁴⁾ The certification procedure, which is laid down in Article 11 of the ECI Regulation, aims to ensure that individual online collection systems comply with the technical specifications set out in [Commission Implementing Regulation \(EU\) 2019/1799](#) of 22 October 2019 (OJ L 274, 28.10.2019, p. 3).

⁽⁴⁵⁾ <https://citizens-initiative.europa.eu/sites/default/files/2023-11/Study%20on%20Technical%20Solutions%20for%20Organisers%20of%20European%20Citizens%20Initiatives.pdf>

⁽⁴⁶⁾ [Commission Implementing Regulation \(EU\) 2019/1799](#) of 22 October 2019 laying down technical specifications for individual online collection systems pursuant to Regulation (EU) 2019/788 of the European Parliament and of the Council on the European citizens’ initiative (OJ L 274, 28.10.2019, p. 3).

compliant throughout the collection period. This would entail additional costs and burdens for ECI organisers ⁽⁴⁷⁾.

(iii) Burden on Member States

The individual online collection systems need to be certified by competent authorities in the Member State where data are stored. As part of the latest reform, the Commission's proposal kept the option for ECI organisers to use individual online collection systems. However, the co-legislators removed this provision from the proposal during the legislative negotiations. As a result, individual online collection systems were phased out and could only be used by ECIs that were registered before 1 January 2023. **Reintroducing those systems would bring back the obligation for Member States to certify them.** The above-mentioned external study concluded that the most effective way of controlling security and data protection risks associated with the decentralised collection of signatures would be to set up a new certification/auditing mechanism, with a set of technical requirements comparable with (but stricter than) the ones previously provided for those individual systems under Commission Implementing Regulation (EU) 2019/1799. The study also estimates that the complexity of the auditing and its costs could place an excessive burden on national authorities ⁽⁴⁸⁾.

Given the impact on Member States if individual online collection systems were to be reintroduced, the Commission consulted the national authorities represented in the ECI Expert Group. Their feedback indicates that the position of Member States has not changed since the legislative negotiation of the second ECI Regulation. The prevailing view was that the central online collection system has been a positive development because it ensures the security of data and their safe transfer and enables a faster verification process. This system could be further enhanced to respond to future emerging needs. Several Member States noted that reintroducing the individual online collection systems would be inefficient and expensive because each Member State would need to ensure the year-round availability of the required resources to timely certify those systems. Some Member States also commented that verification of collected statements of support via an individual online collection system is more complex and time-consuming because the quality of the collected data can vary. Certification by Member States would also introduce a risk of non-uniform implementation.

⁽⁴⁷⁾ The implementation and maintenance costs for the ECI organisers vary according to the nature of the embeddable solution set out in the report of the external experts. If the ECI organisers need to involve external expertise, the simplest solution would cost an average of EUR 9 650 for initial one-off implementation and a further EUR 6 500 in maintenance costs per year. These costs are based on embedding the system in three campaigning websites (which the external study recommends as the maximum number in view of the substantial security and data protection risks involved). The maintenance costs are expected to increase linearly if the solution were to be embedded in more than three websites. These figures include neither the development and maintenance costs to be covered by the Commission nor the costs of certification and auditing by the Member States throughout the collection period.

⁽⁴⁸⁾ The external study estimated the initial one-off cost of certifying each embeddable solution, before starting the collection of statements of support, at EUR 10 000. The study also recommended that national certifying authorities should audit the organisers' websites and the embeddable solution every 4 months, during the twelve-month collection process. These costs are estimated at EUR 3 250 per audit per website (if carried out by a private company). In the case of the more technically complex solution, it is recommended that a regular code audit should take place, which will on average cost another EUR 6 500 per audit per website.

Assessment of the Commission

Having assessed the three areas described above and considering: (i) the significant security and data protection risks of any decentralised solution for collecting statements of support online; (ii) the potentially substantial burdens and related costs for ECI organisers and national administrations of ensuring compliance with strict security and data protection rules; and (iii) the availability of a central system that guarantees high levels of security and data protection, **the Commission has concluded that reintroducing the individual online collection systems is not opportune** because it would run counter to the objective of making the ECI more accessible and less burdensome.

3.5. Verification phase

Since 1 January 2020, seven ECIs have gone through the verification procedure that requires national authorities to certify the validity of the statements of support gathered from their nationals: ‘End the Cage Age’*⁽⁴⁹⁾, ‘Eat original! Unmask your food’*, ‘Cohesion policy’*, ‘Save bees and farmers!’*, ‘Stop finning’, ‘Save cruelty free cosmetics’ and ‘Fur Free Europe’. For the ECIs registered under the second ECI Regulation, organisers are required to transfer the collected statements of support within 3 months after the end of the collection period⁽⁵⁰⁾. This has made the verification process more predictable and allowed Member States authorities to better plan their resources to engage in the verification process. The results of the verification process were positive for six of the seven ECIs. The results of the verification process did not allow the ‘Eat original’ ECI to reach the required thresholds in seven Member States⁽⁵¹⁾.

Competent authorities verify the statements of support in accordance with national law and practice in line with Article 12(4) of the ECI Regulation. The Commission provides guidance to Member States on the practical implementation of the ECI Regulation, including the verification phase. Member States may adopt specific national implementing provisions, which may also cover the verification procedure. These are notified to the Commission and published on the [ECI website](#)⁽⁵²⁾.

Regarding the methodologies used for verification, 14 Member States reported that they had performed an **exhaustive check** of all the statements of support (BG, CZ, EL, ES, FR, HR, CY, LV, HU, AT, PL, RO, SI and SK), while 11 reported that they had performed verifications using **random sampling** (BE, DK, DE, EE, IE, IT, LT, LU, PT, FI and SE)⁽⁵³⁾. In terms of the type of national register used for the verification process, most Member States use the population registers (BE, BG, CZ, DK, DE, EE, IT, CY, LT, LV, LU, HU, AT, PL, PT, RO,

⁽⁴⁹⁾ * = registered under the first ECI Regulation.

⁽⁵⁰⁾ Article 12(2) of the ECI Regulation.

⁽⁵¹⁾ The ECI organisers challenged one of the national decisions in a national court, without success.

⁽⁵²⁾ https://citizens-initiative.europa.eu/how-it-works/implementation-national-level_en

⁽⁵³⁾ Data for the Netherlands and Malta have not been reported by the relevant authorities.

SI, SK, FI and SE ⁽⁵⁴⁾, while several Member States use the electoral registers (IE, EL, ES, FR and HR).

In order of decreasing frequency, the most common irregularities encountered in the course of verification that led to the invalidation of statements of support, as reported by national authorities, were: 1) the lack of identity details or other mistakes that prevent authorities from identifying the signatory; 2) multiple statements of support from the same signatory; and 3) inconsistent personal data provided in the form (including missing data on paper forms). The use of the file exchange service and online collection of statements of support have facilitated the verification process. Overall, Member States are satisfied or very satisfied with the guidance materials provided by the Commission on the file exchange system. Several national authorities reported that the process is smoother and more standardised when the data are transferred directly from the Commission's central online collection system.

In their responses to the survey, ECI organisers considered the procedure for verification as effective overall but noted some delayed responses by Member States.

3.6. Examination and follow-up

Since 1 January 2020, **six valid** ECIs ⁽⁵⁵⁾ have been submitted to the Commission for examination, after over 1 million signatures had been collected. The Commission replied to five of these; the sixth reply is planned for adoption by 14 December 2023. The three-month deadline for the submission of successful initiatives to the Commission ⁽⁵⁶⁾ has provided more certainty to citizens and institutions regarding the follow-up of initiatives, thus addressing a recurrent issue in relation to the implementation of the first ECI Regulation as identified in the 2015 and 2018 reports ⁽⁵⁷⁾.

1) 'Minority Safepack – One million signatures for diversity in Europe' ⁽⁵⁸⁾

This ECI called for the adoption of a set of legal acts to improve the protection of persons belonging to national and linguistic minorities and to strengthen cultural and linguistic diversity in the EU. The organisers submitted the ECI to the Commission on 10 January 2020, having gathered 1 128 422 valid statements of support and reached the necessary thresholds in 11 Member States. The organisers met with European Commission Vice-President for Values and Transparency, Věra Jourová, and the Commissioner for Innovation, Research, Culture, Education and Youth, Mariya Gabriel, on 5 February 2020. On 15 October 2020, the organisers presented their ECI and its proposals at a public hearing at the European Parliament. The ECI

⁽⁵⁴⁾ Portugal ticked 'other registers' and referred to a 'civil identification database' that has been assimilated into a population register for the purposes of this report.

⁽⁵⁵⁾ Three registered under the first ECI Regulation, and three under the second ECI Regulation.

⁽⁵⁶⁾ Article 13 of the ECI Regulation.

⁽⁵⁷⁾ First Report on the application of Regulation (EU) No 211/2011 on the citizens' initiative, COM(2015) 145 final: [https://ec.europa.eu/transparency/documents-register/api/files/COM\(2015\)145_0/de00000000349456?rendition=false](https://ec.europa.eu/transparency/documents-register/api/files/COM(2015)145_0/de00000000349456?rendition=false); Second Report on the application of Regulation (EU) No 211/2011 on the citizens' initiative, COM(2018) 157 final: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018DC0157>

⁽⁵⁸⁾ https://citizens-initiative.europa.eu/initiatives/details/2017/000004_en

was also debated during the European Parliament's plenary session on 14 December 2020. The European Parliament expressed its support for the ECI in a [resolution](#) ⁽⁵⁹⁾ adopted on 17 December 2020.

The Commission adopted its reply to the ECI on 14 January 2021 ([Commission Communication C\(2021\) 171](#) ⁽⁶⁰⁾). The Commission assessed each of the nine individual proposals on its own merits, taking into account the principles of subsidiarity and proportionality. While no further legal acts were proposed, the Commission response stressed that the full implementation of legislation and policies already in place should serve as a powerful set of measures to support the ECI's goals. The Commission is monitoring the implementation of the relevant initiatives and continues to conduct policy actions in these areas ⁽⁶¹⁾.

In April 2021, the ECI's organisers brought an action for annulment against Commission Communication C(2021) 171 before the General Court. In its [judgment](#) of 9 November 2022 ⁽⁶²⁾, the Court dismissed the ECI organisers' request. The General Court held that the Commission had fulfilled its obligation to state its reasons when considering, at the time of the Communication, that no additional legal act was necessary to achieve the objectives pursued by the ECI because of the initiatives already undertaken by the EU institutions in the areas covered by the ECI and the Commission's monitoring of their implementation. The ECI organisers lodged an appeal against this judgment with the Court of Justice on 21 January 2023 (case C-26/23 P).

2) [‘End the Cage Age’](#) ⁽⁶³⁾

This ECI called for a **transition to more ethical and sustainable farming systems**, including a revision of existing EU animal welfare rules. The ECI was submitted to the Commission on 2 October 2020, having gathered 1 397 113 valid statements of support and reached the necessary thresholds in 18 Member States. The ECI organisers met with the European Commission Vice-President for Values and Transparency, Věra Jourová, and the Commissioner for Health and Food Safety, Stella Kyriakides, on 30 October 2020. A public hearing took place in the European Parliament on 15 April 2021. The ECI was debated in the

⁽⁵⁹⁾ https://www.europarl.europa.eu/doceo/document/TA-9-2020-0370_EN.html

⁽⁶⁰⁾ Communication from the Commission on the European Citizens' Initiative 'Minority SafePack - one million signatures for diversity in Europe', C(2021) 171 final: [https://ec.europa.eu/transparency/documents-register/api/files/C\(2021\)171_0/de00000000036104?rendition=false](https://ec.europa.eu/transparency/documents-register/api/files/C(2021)171_0/de00000000036104?rendition=false)

⁽⁶¹⁾ Updates on the follow-up actions are regularly published on the initiative's page in the ECI register: https://europa.eu/citizens-initiative/initiatives/details/2017/000004/minority-safepack-one-million-signatures-diversity-europe_en.

⁽⁶²⁾ Judgment of the General Court of 9 November 2022, *Citizens' Committee of the European Citizens' Initiative "Minority SafePack – one million signatures for diversity in Europe" v European Commission*, T-158/21, EU:T:2022:696: <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:62021TJ0158>

⁽⁶³⁾ https://citizens-initiative.europa.eu/initiatives/details/2018/000004_en

European Parliament's plenary session on 10 June 2021. The European Parliament expressed its support for the ECI in a [resolution](#) ⁽⁶⁴⁾ adopted on the same day.

The Commission adopted its [reply](#) ⁽⁶⁵⁾ to the ECI on 30 June 2021. It announced its intention to adopt, by the end of 2023, a legislative proposal to phase out and ultimately prohibit the use of cage systems for all animals mentioned in the ECI, under conditions to be determined on the basis of opinions from the European Food Safety Authority and the results of an impact assessment and a public consultation. The Commission is now carefully assessing important aspects to ensure that the transition to cage-free farming is sustainable for the agricultural sector and for our food systems, including food security. The preliminary results of the ongoing impact assessment show that the transition to cage-free systems demands the adaptation of several farming parameters, such as enriching the environment of the animals, and providing them with more space, to secure improved welfare conditions for the animals. Further consultations are needed concerning the costs, the appropriate length of the transitional period and the relevant measures at import. To ensure a proper balance between animal welfare and socio-economic impacts, the phasing out of cages has to come with other animal welfare measures at farm level. Preparatory work will therefore continue, including in the context of the strategic dialogue on the future of agriculture in the EU.

3) [‘Save bees and farmers! Towards a bee-friendly agriculture for a healthy environment’](#) ⁽⁶⁶⁾

This ECI called on the Commission to submit a proposal to phase out synthetic pesticides by 2035, to restore biodiversity, and to support farmers during the transitional period. The organisers submitted the ECI to the Commission on 7 October 2022, having gathered 1 054 973 valid statements of support and reached the necessary thresholds in 11 Member States. The ECI organisers met with the European Commission Vice-President for Values and Transparency, Věra Jourová, and the Commissioner for Health and Food Safety, Stella Kyriakides, on 25 November 2022. A public hearing took place at the European Parliament on 24 January 2023. The ECI was debated at the European Parliament's plenary session on 16 March 2023, but no resolution was adopted. The European Economic and Social Committee adopted an opinion on this ECI on 14 December 2022 ⁽⁶⁷⁾.

The Commission adopted its [reply](#) ⁽⁶⁸⁾ to the ECI on 5 April 2023. It welcomed the ECI and acknowledged its importance, in particular in the context of the interlinked crises of climate change, pollution and biodiversity loss. The Commission underlined its view that the priority

⁽⁶⁴⁾ European Parliament resolution of 10 June 2021 on the European Citizens' Initiative 'End the cage age' (2021/2633(RSP)): https://www.europarl.europa.eu/doceo/document/TA-9-2021-0295_EN.html

⁽⁶⁵⁾ Communication from the Commission on the European Citizens' Initiative (ECI) 'End the Cage Age', C(2021) 4747 final: [https://ec.europa.eu/transparency/documents-register/api/files/C\(2021\)4747_0/090166e5df30600f?rendition=false](https://ec.europa.eu/transparency/documents-register/api/files/C(2021)4747_0/090166e5df30600f?rendition=false)

⁽⁶⁶⁾ https://citizens-initiative.europa.eu/initiatives/details/2019/000016_en

⁽⁶⁷⁾ <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/european-citizens-initiative-save-bees-and-farmers>

⁽⁶⁸⁾ Communication from the Commission on the European Citizens' Initiative (ECI) 'Save bees and farmers! Towards a bee-friendly agriculture for a healthy environment', C(2023) 2320 final: [https://ec.europa.eu/transparency/documents-register/detail?ref=C\(2023\)2320&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=C(2023)2320&lang=en)

is to ensure that the proposals currently being negotiated by the co-legislators are adopted on time and then implemented, together with an effective implementation of the common agricultural policy.

4) **‘Stop finning – Stop the trade’** ⁽⁶⁹⁾

This ECI called on the Commission to submit a proposal ‘to end the trade of shark fins in the EU including the import, export and transit of fins unless naturally attached to the animal’s body.’ The organisers submitted the ECI on 11 January 2023, having gathered 1 119 996 valid statements of support and reached the necessary threshold in 15 Member States. The ECI organisers met with the Commissioner for Environment, Oceans and Fisheries, Virginijus Sinkevičius, on 6 February 2023. A public hearing was held at the European Parliament on 27 March 2023. The ECI was debated in plenary debate on 11 May 2023, but no resolution was adopted.

The Commission adopted its [reply](#) ⁽⁷⁰⁾ to the ECI on 5 July 2023. It welcomed the ECI and committed itself to undertake an impact assessment on the environmental, social and economic consequences of applying the ‘fins naturally attached’ policy to the placement on the market of sharks in the EU and to examine the best legal means to request more detailed information with a view to improving relevant statistics. The Commission will also step up the enforcement of EU traceability measures and engage with international partners.

5) **‘Save cruelty free cosmetics – Commit to a Europe without animal testing’** ⁽⁷¹⁾

This ECI called on the Commission to submit a proposal to strengthen and broaden the existing EU bans on animal testing for cosmetics and the marketing of ingredients tested on animals; and to adopt a legislative proposal setting out a roadmap to phase out all animal testing before the end of the current Commission’s term of office. The organisers submitted the ECI to the Commission on 25 January 2023, having gathered 1 217 916 valid statements of support and reached the necessary thresholds in 21 Member States. On 17 March 2023, the ECI organisers met with the Vice-President of the European Commission in charge of Values and Transparency, Věra Jourová, and the European Commissioner for Internal Market, Thierry Breton. The European Parliament organised a public hearing on this ECI on 25 May 2023. The ECI was debated in a plenary debate on 10 July 2023, but no resolution was adopted.

The Commission adopted its [reply](#) ⁽⁷²⁾ to the ECI on 25 July 2023. It welcomed the ECI and acknowledged that animal welfare remains a strong concern for EU citizens, and highlighted the EU’s leading role in phasing out the use of animals in testing and improving animal welfare in general. This role is especially reflected in the complete ban on animal testing for cosmetics

⁽⁶⁹⁾ https://citizens-initiative.europa.eu/initiatives/details/2020/000001_en

⁽⁷⁰⁾ Communication from the Commission on the European Citizens’ Initiative (ECI) ‘Stop finning – Stop the Trade’: C(2023) 4489 final: https://citizens-initiative.europa.eu/sites/default/files/2023-07/C_2023_4489_1_EN.pdf

⁽⁷¹⁾ https://citizens-initiative.europa.eu/initiatives/details/2021/000006_en

⁽⁷²⁾ Communication from the Commission on the European Citizens’ Initiative (ECI) ‘Save cruelty free cosmetics - Commit to a Europe without animal testing’ C(2023) 5041 final: https://citizens-initiative.europa.eu/sites/default/files/2023-07/C_2023_5041_EN.pdf

that has been in place in the EU since 2013. The Commission announced that it would launch a new roadmap with a set of legislative and non-legislative actions to further reduce animal testing, with the aim of ultimately moving to an animal-free regulatory system under chemicals legislation (e.g. REACH, the Biocidal Products Regulation, the Plant Protection Products Regulation and legislation concerning human and veterinary medicines) and continuing to strongly support alternatives to animal testing. The Commission stated that it would also continue its strong support for research into the development of alternatives to animal testing and would explore the possibility of coordinating the activities of the Member States in this field.

6) 'Fur Free Europe' ⁽⁷³⁾

This ECI called on the Commission to submit a proposal to introduce an EU-wide ban on keeping and killing animals for the purpose of fur production, as well as for placing farmed animal fur, and products containing such fur, on the EU market. The organisers submitted the ECI to the Commission on 14 June 2023, having gathered 1 502 319 valid statements of support and reached the necessary thresholds in 18 Member States. On 20 July 2023, the ECI organisers met with European Commission Vice-President for Values and Transparency, Věra Jourová, and the Commissioner for Health and Food Safety, Stella Kyriakides, to present the objectives of their ECI. The European Parliament organised a public hearing on this initiative on 12 October 2023 and a plenary debate took place on 19 October 2023, but no resolution was adopted.

The Commission will adopt its reply by 14 December 2023.

Feedback from ECI organisers participating in the survey

Organisers of successful ECIs who took part in the survey were mostly positive or neutral regarding the clarity of the procedure during the examination phase and were satisfied overall with the opportunities provided to present their ECI during the meeting with the Commission and the public hearing at the European Parliament. They also considered that the Commission had explained in a clear, comprehensible and detailed manner the reasons for its intended action in response to their successful ECI.

3.7. Transparency - funding

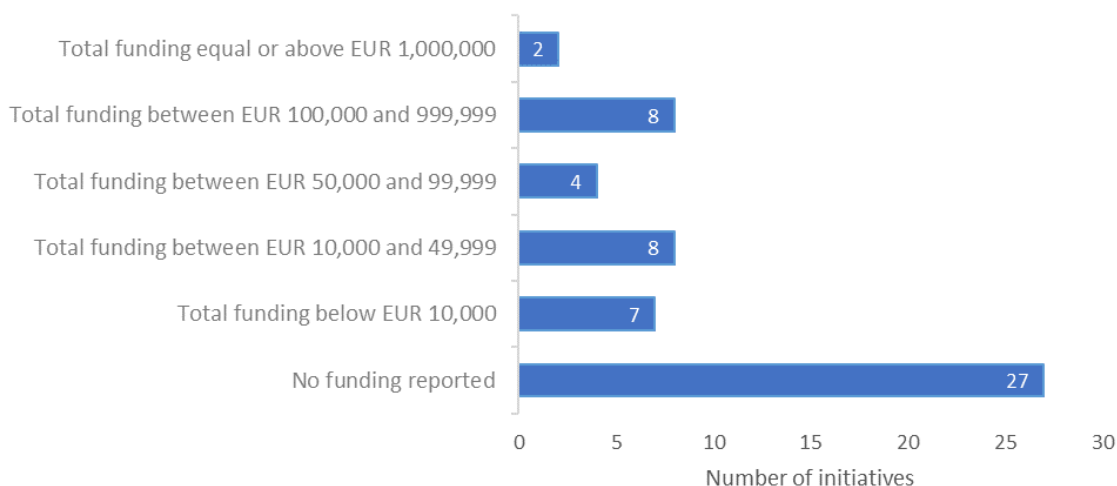
Article 17 of the ECI Regulation requires the ECI organisers to provide comprehensive information about the sources of any funding and in-kind support for the ECI exceeding EUR 500 per sponsor. The information provided indicates an increase in funds raised in support of ECIs, with **two** ECIs ⁽⁷⁴⁾ collecting **over EUR 1 million** (both reached the 1 million

⁽⁷³⁾ https://citizens-initiative.europa.eu/initiatives/details/2022/000002_en

⁽⁷⁴⁾ The 'Save cruelty free cosmetics; and 'Fur Free Europe' ECIs.

signatures threshold) and another eight ECIs ⁽⁷⁵⁾ reporting funding of over EUR 100 000 (four of these ECIs reached the 1 million signatures threshold).

Chart 2: distribution of ECIs by funding



3.8. Protection of personal data

The ECI Regulation has simplified the management of personal data collected in the process of running an ECI.

Firstly, the personal data that citizens must provide to support ECIs has been reduced and harmonised across the 27 Member States, with **only two sets of data from which national authorities can choose**: 1) first names, family names, date of birth and address; or 2) first names, family names and personal identification (document) number. The provision of a minimum set of personal data from signatories is necessary to enable Member States to verify the validity of the statements of support against national databases such as election or population registers. Even though the European Parliament called for further simplification of the data requirements, a consultation of Member States confirmed that such simplification could jeopardise their ability to verify statements of support with the required level of confidence.

To ensure that citizens can easily understand how their personal data are managed in the ECI process and how they can access key information regarding the processing of their data, privacy statements ⁽⁷⁶⁾ covering the different processing operations have been developed and replies to frequently asked questions have been published ⁽⁷⁷⁾.

Secondly, with the transition to the central online collection system and the provision by the Commission of a secure data-transfer system, the Commission is responsible for the

⁽⁷⁵⁾ The ‘Minority SafePack’, ‘Stop Extremism’, ‘End the Cage Age’, ‘Save bees and farmers’, ‘Ban Fossil Fuel Advertising and Sponsorships’, ‘End The Slaughter Age’, ‘Good Clothes. Fair Pay’ and ‘Protect the EU’s Rural Heritage, Food Security and Supply’ ECIs.

⁽⁷⁶⁾ Privacy policy: https://citizens-initiative.europa.eu/how-it-works/privacy-policy_en

⁽⁷⁷⁾ FAQ: https://citizens-initiative.europa.eu/how-it-works/faq_en#Data-protection

management of all personal data collected online through this system. A dedicated data controller module allows the Commission to comply with its duties as data controller and respond swiftly and effectively to data subjects' requests. Therefore, the **ECI organisers' responsibilities and liability for the protection of personal data is limited** to personal data collected on paper statements of support.

Detailed **guidance on data protection for ECI organisers** ⁽⁷⁸⁾ has been made available to help them with data protection compliance. The guidance explains the key principles and terms as well as the ECI organisers' obligations in their capacity as controllers or joint controllers when processing personal data during the ECI process.

Most ECI organisers taking part in the survey considered the data protection rules to be very clear and effective, and reported that they had not experienced any difficulties in complying with them. Several organisers mentioned citizens' reluctance to provide the required personal data as one of the challenges during the collection phase. To assess citizens' views, this topic was included in the surveys for citizens and users of the central online collection system. Only a small number of respondents to the citizens survey stated that they did not want to share their personal data in order to support an ECI. The majority of the citizens who signed an ECI using the Commission's system and who took the exit survey felt confident about the security of the data they provided via the system and most respondents felt reassured by the fact that the Commission (and not another entity) was collecting and storing their personal data. On the other hand, some respondents to the exit survey (17%) rated their confidence level below 5 out of 10, which indicates the need for further awareness raising actions by the Commission about the measures in place to ensure a high level of personal data protection.

3.9. Information and awareness-raising by the Commission and Member States

In line with Articles 4 and 18 of the ECI Regulation, the Commission has set up the multilingual 'EU Take the Initiative' communication campaign to raise awareness about the existence, objectives and functioning of the ECI through a wide range of activities. The campaign makes extensive use of digital technologies and social media as well as the support of the Commission Representations in all Member States.

ECI communication campaign activities

- In addition to the **multilingual ECI website** ⁽⁷⁹⁾, information about the ECI is provided through: the **monthly ECI newsletter** ⁽⁸⁰⁾ (available in all EU languages via automatic translation); **social media campaigns across the EU27**; presence in **youth/democracy festivals at national level**; **media relations, webinars** and information sessions for the

⁽⁷⁸⁾ Data protection: https://citizens-initiative.europa.eu/how-it-works/data-protection_en

⁽⁷⁹⁾ <https://citizens-initiative.europa.eu/en>

⁽⁸⁰⁾ <https://ec.europa.eu/newsroom/ecif/newsletter-archives/view/service/1501>

general public or multipliers who help disseminate information at national level; and a **podcast series** ⁽⁸¹⁾.

- **Young people** are a key target group. In June 2023, a **multilingual educational toolkit** ⁽⁸²⁾ was launched, allowing teachers to engage pupils in the last years of secondary education in discussions and activities related to active EU citizenship and the tools available at EU level, including the ECI. It is accompanied by a **video competition** ⁽⁸³⁾ for the students launched in October 2023.
- A **network of ambassadors and multipliers** has been created to help spread messages at national and local level. It includes the **national contact points** ⁽⁸⁴⁾, **ECI Ambassadors** ⁽⁸⁵⁾ (representing mainly civil society organisations), Europe Direct centres ⁽⁸⁶⁾ and **other EU institutions and partners**.

The Commission also ensures the promotion of the ECI in the Commission's Open Day ⁽⁸⁷⁾ in early May each year and in events organised by other EU institutions, such as the ECI Day ⁽⁸⁸⁾, the European Week of Regions and Cities ⁽⁸⁹⁾ and the European Youth Event ⁽⁹⁰⁾. In the last quarter of 2023, the Commission is also carrying out a communication campaign celebrating the **30th anniversary of EU Citizenship**, to further raise awareness and understanding among EU citizens of their rights; the ECI is one of the rights covered by the campaign.

Other EU institutions and bodies also contribute to raising awareness of the ECI – notably the European Economic and Social Committee through the annual ECI Day and the European Parliament on the occasion of the ECIs' hearings and plenary debates.

The campaign was impacted in 2020-2021 by the **COVID-19 pandemic** and the public focus on Russia's war of aggression against **Ukraine** in 2022, but performance has nevertheless been good, with **positive trends** for traffic to the [ECI website](https://citizens-initiative.europa.eu/news/citizencentral-podcast_en) ⁽⁹¹⁾ (more than doubled since 2020); subscriptions to the ECI newsletter (130 000, which represents a six-fold increase since 2020) and the reach of the social media campaigns (over 130 million campaign messages displayed since 2020).

⁽⁸¹⁾ https://citizens-initiative.europa.eu/news/citizencentral-podcast_en

⁽⁸²⁾ https://citizens-initiative.europa.eu/schools/eci-educational-toolkit_en

⁽⁸³⁾ https://citizens-initiative.europa.eu/schools/video-competition_en

⁽⁸⁴⁾ https://citizens-initiative.europa.eu/contact-points-national-level_en

⁽⁸⁵⁾ https://citizens-initiative.europa.eu/spread-word/eci-ambassadors_en

⁽⁸⁶⁾ https://european-union.europa.eu/contact-eu/meet-us_en

⁽⁸⁷⁾ https://europeday.europa.eu/european-commission-2023_en

⁽⁸⁸⁾ <https://www.eesc.europa.eu/en/agenda/our-events/events/eci-day-2023>

⁽⁸⁹⁾ <https://regions-and-cities.europa.eu/>

⁽⁹⁰⁾ <https://european-youth-event.europarl.europa.eu/en/>

⁽⁹¹⁾ <https://citizens-initiative.europa.eu/en>

Despite the positive trends and wide range of activities being carried out, various stakeholders (citizens, organisers, NGOs, other EU institutions) consider that there is insufficient public awareness of the ECI. Organisers report the lack of ECI awareness as an important challenge during their collection of statements of support and citizens report it as the main reason why they had not supported ECIs. At the same time, the EU-wide level of awareness of EU citizens (as measured by two subsequent Eurobarometer series ⁽⁹²⁾) ranges from 41% in 2021 to 64% in 2023 ⁽⁹³⁾.

National contact points

In line with Article 4(6) of the ECI Regulation, each Member State has established one or more national contact points ⁽⁹⁴⁾ to provide free-of-charge information and assistance to ECI organisers. The Commission keeps the national contact points informed about the latest ECI developments and provides them with materials in all EU languages for distribution to national audiences. Member States reported in their survey replies that most contact points provide information on their websites and reply to requests from citizens or the media. A few also take a proactive approach and use a wider range of communication channels and activities to inform citizens. The results of the same survey indicate that the contact points have all the information and documentation they need to confidently perform their role. The Commission provides opportunities for them to exchange experiences and share good practices.

3.10. Guidance and support to organisers

As agreed during the 2019 ECI reform, substantial in-kind support was made available to ECI organisers in the form of the free-to-use central online collection system (and related IT support offered by the Commission); guidance, training and legal advice through the ECI Forum (managed by the Commission through an external contractor); and increased activities to raise awareness about the ECI, which also indirectly promote ongoing ECIs.

ECI Forum

In accordance with Article 4 of the ECI Regulation, the Commission makes available, free of charge, an online collaborative platform for the ECI, which provides practical and legal advice, and a discussion forum for the exchange of information and best practices. The Commission has subcontracted the management of this platform (the ECI Forum ⁽⁹⁵⁾) to an external service provider following an open tender.

In their dedicated survey, ECI organisers' feedback was overall positive regarding the advice provided by the ECI Forum at different stages of the ECI process, including during the two-stage registration procedure (when they need to revise their initial submission) and during the

⁽⁹²⁾ Based on interviews with a representative sample of citizens, aged 15 and over, in each of the 27 Member States of the European Union.

⁽⁹³⁾ Flash Eurobarometer 528 'Citizenship and democracy' (2023)

⁽⁹⁴⁾ https://europa.eu/citizens-initiative/contact-points-national-level_en

⁽⁹⁵⁾ <https://citizens-initiative-forum.europa.eu/en>

collection phase. ECI organisers have made extensive use of the Forum's learning materials before registration and rate highly the webinars, blogs, online course and the ability to search for other members for their group.

ECI Forum activities

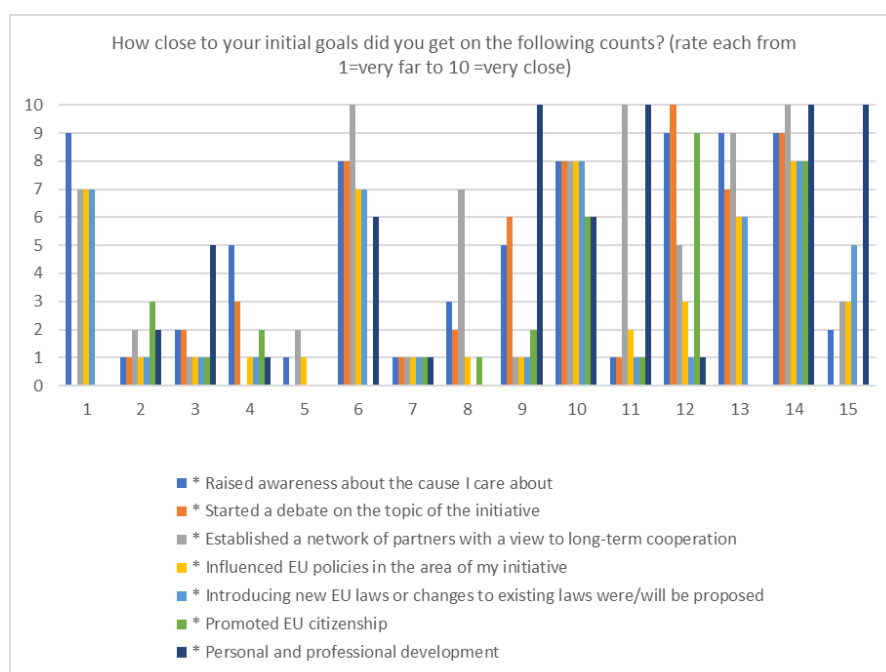
- The ECI Forum offers a wide range of **learning materials** to help citizens to prepare and run an ECI (guidance notes, success stories, etc.); **webinars**; an **online course**; and **presentations** at universities and events.
- It also organises, under the Commission's guidance, **consultations with stakeholders** on various aspects of the implementation of the Forum and the functioning of the ECI to improve the services offered to ECI organisers.

3.11. Organisers' experience with the ECI

Most surveyed organisers state that they started their ECI journey out of **personal interest in a cause that they believed should be addressed at EU level**. A third of respondents to the survey started an ECI out of **professional or academic interest** – including, in one case, in response to other ECIs ('a reaction to the fact there is no way to sign against an ECI'). Several respondents cite links to past ECIs. Half of the survey respondents had previously explored other tools (e.g. petitions at national level or to the European Parliament) but considered that they did not sufficiently achieve their goals. The ECI was chosen because it had greater **political impact** ('because the Commission is forced to respond'), was a 'strong support for advocacy strategies and to give more legitimacy to the campaign' or because of its **EU-wide dimension**. One ECI organiser stated having carefully planned the timing of the ECI so that it could be taken into account in a planned review of the relevant legislation.

Most respondents **consider the ECI to be a worthwhile experience** because they came close to their initial goals on at least one or several of the counts mentioned in the survey (see Chart 3). In terms of what they achieved through the ECI, organisers gave the highest scores to personal and professional development; raising awareness about the cause they care about; starting a debate on the topic of their ECI; and establishing a network of partners with a view to long-term cooperation.

Chart 3: organisers' views on the achievement of their initial goals



4. IMPACT OF COVID-19 PANDEMIC

The COVID-19 pandemic had an unprecedented impact on Member States and their citizens. The national confinement measures and, more generally, the omnipresence of the pandemic made it nearly impossible for ECI organisers to successfully continue their local campaigning activities and the collection of statements of support on paper that were necessary in order to gather the required support within the twelve-month period. In response to the exceptional circumstances and in order to preserve the efficacy of the ECI instrument during the pandemic, the EU institutions swiftly adopted temporary measures (in the form of [Regulation \(EU\) 2020/1042](#) ⁽⁹⁶⁾), such as an extension of the collection periods for affected ECIs; an extension of the verification and examination periods for national competent authorities and EU institutions respectively; and specific arrangements for the Commission meeting with the ECI organisers and the public hearing in the European Parliament.

In conjunction with the subsequent implementing acts ⁽⁹⁷⁾, the temporary measures served their purpose. Owing to these temporary measures, **12 ECIs were granted extensions** of up to 12 months to collect signatures and 3 of these ⁽⁹⁸⁾ were therefore able to reach the required

⁽⁹⁶⁾ [Regulation \(EU\) 2020/1042](#) of the European Parliament and of the Council of 15 July 2020 laying down temporary measures concerning the time limits for the collection, the verification and the examination stages provided for in Regulation (EU) 2019/788 on the European citizens' initiative in view of the COVID-19 outbreak (OJ L 231, 17.7.2020, p. 7–11).

⁽⁹⁷⁾ [Commission Implementing Decision \(EU\) 2020/2200](#) of 17 December 2020, C/2020/9226; [Commission Implementing Decision \(EU\) 2021/360](#) of 19 February 2021, C/2021/1121; [Commission Implementing Decision \(EU\) 2021/944](#) of 3 June 2021, C/2021/3879. All three implementing decisions provide for the extension of the periods for the collection of statements of support for certain ECIs pursuant to Regulation (EU) 2020/1042.

⁽⁹⁸⁾ 'Cohesion Policy', 'Save bees and farmers!' and 'Stop Finning – Stop the Trade'.

thresholds. In addition, the Commission granted to one Member State upon request an extension of the deadline for completing its verification obligations.

Not all ECIs whose representatives responded to the survey were impacted by the COVID-19 pandemic to the same degree. For the significantly impacted ECIs, the following measures were regarded as most effective in addressing the challenges posed by the COVID-19 pandemic: the extension of deadlines for signature collection; the availability of an online infrastructure for running an ECI; and the shift to online activities which made it easier to promote the ECI.

5. WAY FORWARD

The COVID-19 pandemic significantly disrupted the functioning of the ECI in the first two years of application of the second ECI Regulation. As described above, the temporary measures proved their effectiveness given the extraordinary circumstances and the ECI could resume its normal functioning once the restrictive measures were lifted. Various positive developments can already be noted, but the Commission estimates that the full impact of the revised rules can only be assessed over a longer period of application under normal circumstances.

Based on the assessment of the application of the second ECI Regulation presented above, the Commission considers that the ECI rules that were introduced in 2020 provide a more accessible, less burdensome and more user-friendly framework for ECI organisers and supporters. At the same time, the Commission also considers – having taken into account the views of the European Parliament, European Economic and Social Committee ⁽⁹⁹⁾ and those of ECI organisers, citizens and stakeholders – that further practical improvements can already be made within the existing legal framework.

In view of the above assessment and the European Parliament’s resolution of 13 June 2023 on the implementation of the ECI regulations, the Commission will implement the following actions:

Action 1: enhancing ECI awareness and visibility

Increasing citizens’ awareness of their rights is essential for their active and effective participation in the democratic life of the EU.

- The Commission will therefore **continue and streamline the multilingual ECI communication campaign**, with an increased use of social media.
- Campaign activities will also prioritise **young people**.
- The Commission will actively seek the **involvement of the European Parliament (and of its liaison offices in the Member States) and Member States (through the national contact points)** in the communication campaign, while also welcoming the contribution of other EU institutions and bodies, as well as of regional and local authorities, educational institutions and civil society organisations.

⁽⁹⁹⁾ Recommendation of the Ad hoc Group on the European Citizens' Initiative 'Functioning of the European citizens' initiative - 2020-2022': https://www.eesc.europa.eu/sites/default/files/files/ahg_eci_recommendation_on_eci_functioning_2020-2022_3_2.pdf

- Following the Conference on the Future of Europe and the Commission's renewed efforts on citizens' participation, the ECI is being included in the revamped Have Your Say portal – the **new online 'one-stop-shop' on citizens' engagement**, which provides additional opportunities to make the ECI more visible.
- The Commission will cooperate with the national contact points to **promote the ECI website on relevant national platforms**.

Action 2: strengthening support for ECI organisers

The Commission recognises that setting up and managing an ECI requires time, resources, dedication and perseverance. It will therefore strengthen its support for ECI organisers.

- The Commission will continue to support the ECI organisers directly or indirectly by offering a number of services, such as **guidance and legal advice (via the ECI Forum); the free-of-charge use of the secure and user-friendly central online collection system** which significantly reduces the responsibilities of ECI organisers as data controllers; and **free-of-charge translation services**.
- **In-kind support to organisers will be further enhanced** within the current budgetary and legal provisions by: providing further guidance on practical topics related to running ECIs (in particular, raising funds and promoting ECIs across the EU); enhancing guidance on EU and Commission competences and other aspects of making ECIs registrable; and further improvements to the IT tools (particularly the central online collection system).
- The Commission will **step up its provision of information about possible financial support under existing EU programmes**, within the specific criteria of each call for proposals. For instance, the 'Citizens, Equality, Rights and Values' (CERV) programme⁽¹⁰⁰⁾ funds projects in the area of citizens' engagement. To facilitate ECI organisers' access to such funding, the Commission will consistently provide information about relevant calls for proposals and dedicated information sessions in its monthly ECI newsletters. In addition, the Commission will regularly inform the national contact points for the CERV programme about the ECI so that they are well-equipped to respond to requests for information from potential ECI organisers. The Commission will also ensure that available in-kind support for organisers is tailored and targeted to their needs (including funding needs) and that they are informed about all the services available to them.

Action 3: continued improvement of the central online collection system

As shown by the extensive feedback collected from citizens, the central online collection system is an easy-to-use and reliable tool for the online collection of signatures, that also meets the high security standards required when handling large amounts of personal data as in the case of ECIs.

⁽¹⁰⁰⁾ https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/citizens-equality-rights-and-values-programme_en

- The Commission will continue to **further develop the central online collection system** (based on feedback and suggestions collected during the review from ECI organisers, experts and citizens, as well as through regular testing and consultations with users) in order to meet ECI organisers' needs even better.
- The Commission will consider **other improvements** such as adding further options to customise the system to make it more campaigner-friendly and more engaging, such as providing ECI organisers with real-time statistics and a dashboard to keep track of their ECI; and assessing ways to alert signatories so that they do not sign the same ECI multiple times.
- Communication actions will also focus on increasing citizens' awareness on how compliance with the data protection requirements is ensured when collecting their personal data through the central online collection system.

Action 4: strengthening ECI implementation at national level and in cooperation with civil society

The ECI Expert Group organised by the Commission provides a specific forum to consult and exchange practices with the Member States' authorities. The Commission also regularly organises stakeholder consultations and surveys to collect feedback and contributions with a view to making further practical improvements to the implementation of the ECI. To further strengthen ECI implementation at national level and cooperation with civil society, the Commission will implement two measures.

- **In the context of the ECI Expert Group**, the Commission will continue to **support Member States in the implementation of their obligations in the ECI process**, focusing for example on the verification of statements of support, the lowering of the minimum age for supporting ECIs, the integration of national eID schemes with the central online collection system, improvements to the file exchange service or the provision of information and assistance to ECI organisers.
- The Commission will **further involve stakeholders (including civil society organisations)** whenever their expertise could prove useful on specific aspects of the implementation of the ECI Regulation, such as improvements to the central online collection system; identifying further training and guidance needs for ECI organisers; and increasing ECI awareness and visibility (for instance, by interlinking the ECI website with relevant online platforms on citizens' participation at national level).

Action 5: a more visible follow-up of ECIs

In line with Article 15(1) of the ECI Regulation, the Commission meets the organisers of successful ECIs to allow them to explain their objectives in detail. In line with Article 15(2), the Commission thoroughly substantiates its replies in the form of Communications adopted by the College. In addition, for the three most recent successful ECIs, the Member of the Commission responsible for the relevant policy area also met the organisers of successful ECIs after the Commission had adopted its reply.

- To **better inform ECI organisers and citizens on the follow-up actions** the Commission intends to take in response to valid ECIs, the Commission will from now on make such follow-up meetings standard practice.
- The Commission will ensure that **successful ECIs are taken into account systematically when developing policy proposals in response to these ECIs** and that their organisers are consistently included in consultations related to the proposals concerned.
- The Commission will more strongly highlight **successful ECIs** and the follow-up actions they triggered **in its communication campaigns**, in order to increase citizens' awareness of the impact of ECIs on the EU policy-making process.

6. CONCLUSION

Based on this review report, the Commission considers that the revised ECI Regulation delivers a more accessible, less burdensome and more user-friendly framework for ECI organisers and supporters. The Commission remains fully committed to ensuring that the revised ECI achieves its full potential as a tool for fostering debate and citizens' participation at EU level. It will therefore take a number of concrete actions to further improve the functioning of the ECI and the supporting infrastructure for organisers, as well as showcase the impact of ECIs on EU policies.

The Commission acknowledges the essential contribution that the European Parliament and Member States make to the effective implementation of the ECI Regulation. The Commission also welcomes the contribution of other EU institutions and bodies, as well as other stakeholders, to enhancing the ECI's visibility at EU, national and local levels and to making EU citizens aware of their right to use the ECI to shape EU policies.

ANNEX

Chart 4: distribution of organisers by nationality and residence

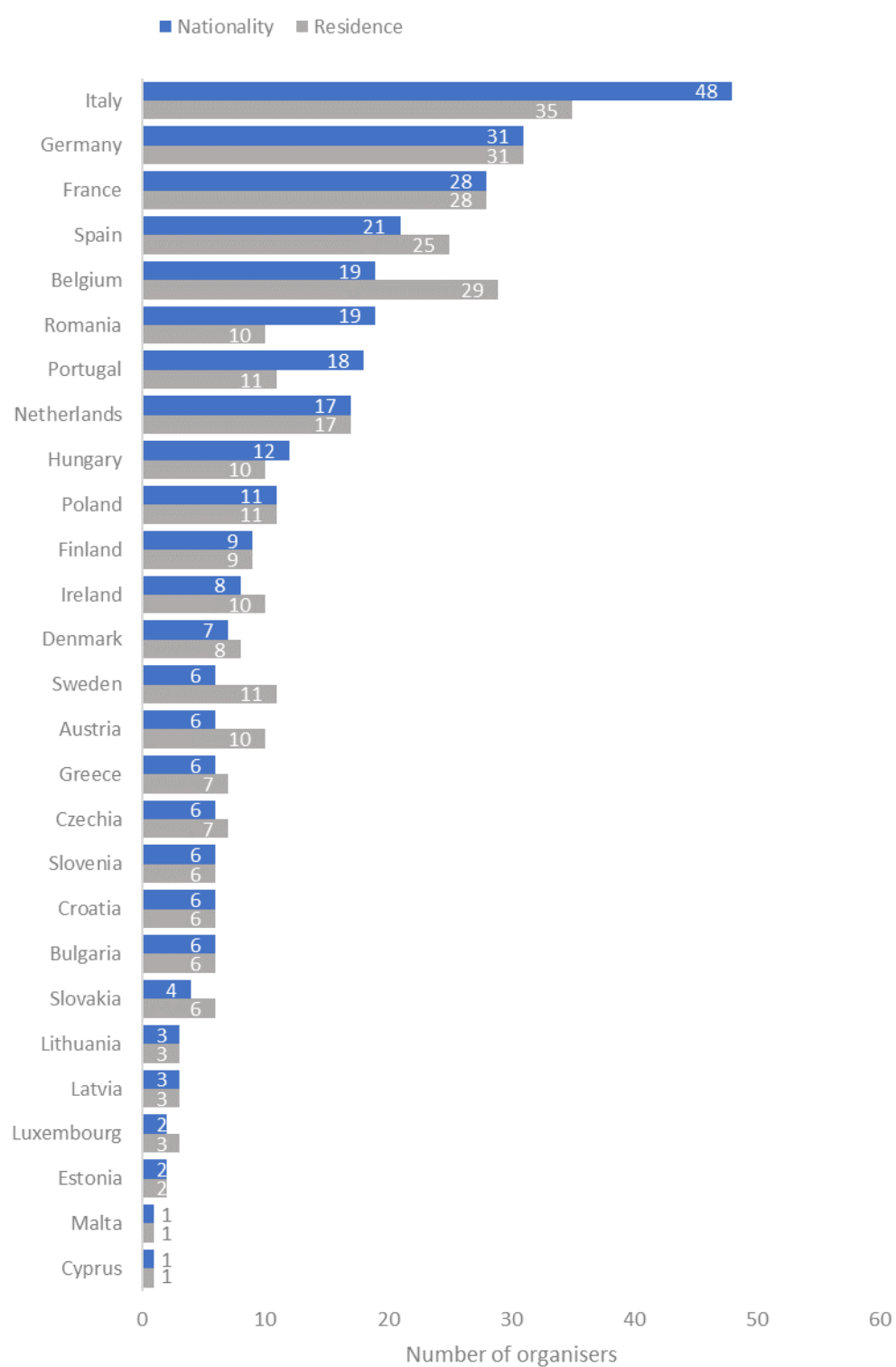


Chart 5: distribution of organisers by age

